

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

DECLARATION OF AELISH M. BAIG IN SUPPORT OF
PLAINTIFFS' REPLY IN SUPPORT OF REQUEST
FOR ENTRY OF DEFAULT

I, AELISH M. BAIG, declare as follows:

1. I am a member of the law firm of Robbins Geller Rudman & Dowd LLP, which has been appointed to the plaintiffs' executive committee of the MDL and represents plaintiffs County of Summit, Ohio; City of Cleveland; and County of Cuyahoga, Ohio (collectively, "Plaintiffs") in the above-captioned action. I have personal knowledge of the matters stated herein; and, if called upon, I could and would competently testify thereto. I submit this declaration in support of Plaintiffs' Reply in Support of Request for Entry of Default.

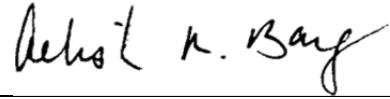
2. Attached hereto as Exhibit 4 is a true and correct copy Allergan Finance, LLC's Responses and Objections to Plaintiffs' Amended Notice of Deposition Pursuant to Rule 30(b)(6) and Document Request Pursuant to Rule 30(b)(2) and Rule 34, dated July 11, 2018.

3. Attached hereto as Exhibit 5 is a true and correct copy of Allergan's Second Amended Written Responses to Topics 1, 2, and 45 Identified in Plaintiffs' Amended Notice of Deposition Pursuant to Rule 30(b)(6), dated November 16, 2018.

4. Attached hereto as Exhibit 6 is a true and correct copy of Allergan's Second Amended Written Responses to Topics 17, 18, 24, 25, and 26 Identified in Plaintiffs' Amended Notice of Deposition Pursuant to Rule 30(b)(6), dated November 16, 2018.

5. Attached hereto as Exhibit 7 is a true and correct copy of a relevant excerpt from Exhibit 3 to the transcript of the videotaped deposition of Stephan Kaufhold, Allergan's designated witness for Rule 30(b)(6) deposition Topic 43.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 11th day of February, 2019, at San Francisco, California.



AELISH M. BAIG

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 11, 2019, the foregoing was filed electronically with the Clerk of Court using the Court's CM/ECF system, and will be served via the Court's CM/ECF filing system on all attorneys of record.

s/ Aelish M. Baig
AELISH M. BAIG

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